

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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LATERAL RECOVERY LLC, BENCHMARK,  
BULIDERS, INC., FTE NETWORKS, INC.,  
JUS-COM LLC and FOCUS WIRELESS, LLC,

Civil Action No.: 1:22-cv-02170

*Plaintiffs,*

-against-

FUNDERZ.NET, LLC d/b/a HOP CAPITAL  
and d/b/a BUSINESS MERCHANT FUNDING,  
JOSEPH YITZCHAKOV a.k.a JOSEPH  
ISAACOV, GAVRIEL YITZCHAKOV  
a.k.a. GABE ISAACOV, and JOHN and JANE  
DOE INVESTORS,

*Defendants.*

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**DECLARATION IN SUPPORT OF THE MOTION FOR ADMISSION OF  
HOWARD W. FOSTER, ESQ. *PRO HAC VICE***

I, Howard W. Foster, Esq., under penalties of perjury and pursuant to 28 U.S.C. § 1746, declare the following to be true and correct:

1. I am an attorney practicing law in the State of Illinois at Foster P.C. I submit this Declaration in support of my application to practice *pro hac vice* in the above-captioned action as counsel for Defendants, Funderz.net, LLC d/b/a Hop Capital and d/b/a Business Merchant Funding and Joseph Yitzchakov a/k/a Joseph Isaacov.

2. I am admitted to the bar of the State of Illinois and attach hereto as **Exhibit A** my Certificate of Good Standing.

3. I have never been convicted of a crime, censured, suspended, disciplined or disbarred by any court and there are no such matters pending against me.

4. My Illinois state bar number is 6201218.

5. I am familiar with and will comply with the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York.

6. I am submitting this Declaration in support of my Motion for Admission, *Pro Hac Vice*, filed simultaneously herewith.

WHEREFORE, it is respectfully requested that this Court grant the within Motion and thereby permit my admission to practice *pro hac vice* in the United States District Court for the Southern District of New York to serve as counsel on behalf of Defendants, Funderz.net, LLC d/b/a Hop Capital and d/b/a Business Merchant Funding and Joseph Yitzchakov a/k/a Joseph Isaacov in the above-captioned case and any proceeding commenced in connection therewith.

Dated: January 20, 2022

By:   
Howard W. Foster